

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CITIBANK, N.A.,

Plaintiff,

-against-

ARALPA HOLDINGS LIMITED PARTNERSHIP  
AND RODRIGO LEBOIS MATEOS,

Defendants.

Case No. 22-cv-08842 (JLR)

**DECLARATION OF ADAM KAUFF**

Pursuant to 28 U.S.C. § 1746, I, Adam Kauff, declare as follows:

1. I am a partner in the law firm Kauff Laton Miller LLP and counsel to Citibank, N.A. (“Citibank”), the Plaintiff in the above-captioned action. I respectfully submit this declaration in support of Citibank’s motion for the issuance of a writ of execution and turnover order against One57 36B LLC (“One57”) and Aralpa Miami Investments LLC (“Aralpa Miami”), for prejudgment attachment and a temporary restraining order against One57 and Aralpa Miami, and to compel Rodrigo Lebois Mateos (“Lebois”) to provide responses to the information subpoena served on him.

2. Attached hereto as Exhibit A is a true and correct copy of an email dated December 1, 2023 from Citibank’s counsel, Jonathan Perrelle, to Lebois’ counsel, John Conte, requesting additional information regarding Lebois’ response to the information subpoena and Mr. Conte’s December 6, 2023 response thereto.

3. Neither Lebois nor his counsel have provided a further response or information in response to Citibank’s December 1, 2023 request.

4. I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 19, 2024.

A handwritten signature in blue ink, appearing to read 'A. Kauff', positioned above a horizontal line.

Adam Kauff